

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA

In re:) Case No. 20-00411
)
RYAN'S ELECTRICAL SERVICES, LLC.,) Chapter 11
)
Debtors.) **LIMITED OBJECTION TO
) COMMUNITY STATE BANK
) MOTION FOR ADEQUATE
) PROTECTION
)**

Debtor, by and through the undersigned, objects to the Motion for Adequate Protection (Docket #32) in limited fashion, as follows:

1. Debtor and Community State Bank (CSB) are engaged in good faith negotiations to the secured position of CSB relative to the Internal Revenue Service.
2. A tentative draft stipulated Order is being circulated by the parties. The IRS has reservations and Debtor needs to speak with the IRS on concerns and Plan treatment.
3. The proposed Order before this Court, at Docket 32-1, does not reflect the position of the Debtor. For that, and other grounds under the Bankruptcy Code, such Motion should be denied, and proposed Order rejected by this Court.
4. Debtor's objection is place-holding in nature, absent the parties ability to reach a stipulated Order.

RESPECTFULLY SUBMITTED,

/s/ Robert C. Gainer
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 8, 2020, the foregoing instrument was filed electronically with the Clerk of Court using the CM/ECF system which sent notification of such filing to all registered users party to this case.

/s/ Robert C. Gainer